

The NPRM further offered three specific areas for consideration:

- 1) Waiver of Amateur Radio and license-exempt rules, permitting transmissions necessary to meet essential communications needs.
 - a. Comment: A waiver of the Amateur Radio rules to allow qualified amateurs without HF privileges is a good idea. It would provide the manpower needed to staff emergency radio posts for 24-hour operation.
 - b. It would not be a good idea to allow such operations on an on-going basis without someone with knowledge of amateur radio procedures, rules and frequencies at the control point.
 - c. As always, operation by anyone on any frequency to support life-threatening communication should be allowed.
- 2) Waiver of application filing deadlines.
 - a. The waiver of application filling deadlines was a good idea and should be continued.
 - b. Such a waiver of deadlines should be accompanied with a stated new deadline. The new deadline could be extended if needed.
- 3) A streamlined special temporary authority (STA) process.
 - a. Amending the rules to permit automatic grants of STA operations in disaster areas should be considered.
 - b. Those new rules should state in very clear terms all parameters under which STA is granted. Such as:
 - i. Who would declare a disaster area?
 - ii. The types of communications authorized.
 - iii. Any types of communications not allowed.
 - iv. The ranges of frequencies authorized.
 - v. How to determine when the temporary authority has expired.

In the past the FCC has often asked the amateur community to vacate certain frequencies for specific emergencies. In general amateurs have responded favorably to those requests. However there is no clear way of knowing when frequency requests have been made, or the frequencies involved. Currently that information is passed by word of mouth – sometimes with errors. Occasionally operators resist taking the “word” of an operator unknown to them and often that person is unable to detail where the “authority” of the request originated.

- 1) Requests should be posted on the FCC's web site. Unfortunately too many hams have problems with the ARRL and refuse to take their word for anything.

- 2) The FCC should consider certain frequency ranges on various bands to be the “standard frequencies” for requests. I know that this suggestion flies in the face of the FCC’s opinion on the subject, however:
- a. Operators and/or emergency responders would know where to go during emergencies.
 - b. Operators seeking assistance would know where relief operation has been, or will be set up.
 - c. It would be fast and easy to get the word out for either the start or end of the requests.
 - d. Amateurs would not be “surprised” to find out “their” frequency had been requested – because it would have been common knowledge before they started using the frequency that such a request could happen.
 - e. In the “old” days of civil defense even the AM broadcast band had designated frequencies, which everyone knew. It was a good idea then, and it is a good idea now.

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